

**Della Saunders**  
**Preliminary Chemist--Cocaine**

**Background**

- Name
- Employed
  - Where
  - How long
  - Current Position
  - Duties and responsibilities in that position
- Education
  - Where
  - Degrees

**Training**

- Training you received WRT to your current position as a chemist working for the DPH
  - 6 week training program
- How many chemists are employed at the lab
  - 15 cover the eastern half of the state
  - 3 cover the western half of the state
- Periodically training
  - Periodic testing as quality control check
- Have you had the opportunity to test substances to determine if they contain narcotics
  - How many times
- # of analyses you do per week
- Approximately how many cocaine samples have you tested during your career at the lab?

**Expert Testimony**

- Testified as in court regarding substances that you have analyzed in criminal cases?
  - # times
  - Courts





**Test for cocaine**

- Can you describe the test(s) to determine whether a substance contains cocaine
  - If cocaine is present what happens during that test (those tests)
  - Does this test have a name/do these tests have names

**Lab Procedures**



- Does your laboratory have protocols in place for receiving substances from police agencies for testing
- Can you explain in general how the lab receives substances from police agencies
- Once the substance(s) have been logged in how do they get assigned to a particular chemist for testing and analysis
- How do you receive case assignments for testing and analysis
- What happens when you are assigned a case
- How do you keep track of the cases you are assigned
- Did you have an opportunity to analyze some substances in this case

**This case**

- Did you receive some items for analysis in this case
- Did the laboratory assign analysis numbers to those items
  - When does that happen
- What type of substances were you assigned to test in this case
  - Clear bags containing white powder
- What were the analysis numbers that you were assigned to analyze
  - 
  - 
  - 
  - 

**Testing**

- Before you do any testing do you check to make sure your equipment is working properly
  - Describe
    - Check balances
    - Check reagents

-  Can you tell us step by step what you did with those substances to analyze item 
  - 14 bags
  - Weighed all 14 bags
    - How
      - Weigh package with substance inside—Gross weight
      - Open package
        - Weigh empty package
        - Subtract to get the difference between gross weight and empty package—net weight
    - Weight
      - Each bag
        - 0.9088 grams
        - 1.02188 grams
        - 0.9924 grams

- 0.55448 grams
  - 0.9730 grams
  - 0.46810 grams
  - 0.4503 grams
  - 0.5375 grams
  - 0.4516 grams
  - 0.9241 grams
  - 0.5377 grams
  - 0.8402 grams
  - 0.5701 grams
  - 0.4538 grams
  - Total 9.68 grams
- Testing
  - Preliminary color test
    - Blue for cocaine
      - Turned blue
    - Do it for each of the 14 bags?
  - Micro-crystalline test
    - Tests for naturally occurring cocaine v. synthetic cocaine
      - Naturally occurring cocaine
      - Never seen synthetic cocaine at lab
    - Do it for each of the 14 bags?
  - Put small amount in methanol
    - Dissolves
    - Do it for each of the 14 bags?
  - Put on a batch
    - Test runs overnight
    - Do it for each of the 14 bags?
  - Result—cocaine
    - For each of the 14 bags?
  - Give to Annie
  - Annie does confirmatory testing
  - Annie gives Della her results
  - Della puts the substance in a heat-sealed bag
    - Puts her initials on the bag
    - Analysis number on the bag
- Are the steps you just described the normal policies and procedures for testing an unknown substance
- Were you able to conclude to a reasonable degree of scientific certainty what substance was contained in item [REDACTED]
  - Cocaine
    - Mark as exhibit

**Cert for** [REDACTED]

- Did you generate a report that documented your observations and analysis
  - Approach

- Recognize
- What
- How does this document get created?
  - Reflect that it is cocaine
  - Weight of the cocaine
- Is your signature on the document
- Does this document relate to these drugs
  - How do you know that these drugs relate to this drug certificate
    - Admit drug cert for [REDACTED]

#### **After analysis**

- Once you have completed your analysis of drug evidence what are the procedures at the state drug laboratory
- Give them to the confirmatory chemist
  - Annie Dookhan
- After her confirmatory testing is done, she returns them
  - Place them in heat sealed bag
  - Put initials on them
  - Put lab number on them
  - Dookhan signs the drug cert
  - Return the samples to person who did the intake on them at the lab
  - Police Department is contacted to pick up the items
- Were those procedures followed in this case

